

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$11,250.00 IN UNITED STATES
CURRENCY,

Defendant *In Rem*.

Civil No.:

VERIFIED COMPLAINT FOR FORFEITURE IN REM

TO THE HONORABLE COURT:

COMES NOW, the United States of America brings this Verified Complaint for Forfeiture *In Rem* pursuant to Supplemental Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

Nature of the Action

1. This is a civil action *In Rem* pursuant to:

- a. 18 U.S.C. § 981(a)(1)(C) “Any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of any offense constituting “specified unlawful activity””.
- b. 16 U.S.C. § 1538 (a)(1)(E) “with respect to any endangered species of fish or wildlife listed pursuant to section 1533 of this title it is unlawful for any person subject to the jurisdiction of the United States to deliver, receive, carry, transport, or

ship in interstate or foreign commerce, by any means whatsoever and in the course of a commercial activity, any such species”.

c. 16 U.S.C. § 1538 (g) “It is unlawful for any person subject to the jurisdiction of the United States to attempt to commit, solicit another to commit, or cause to be committed, any offense defined in this section”.

d. 18 U.S.C. § 1343 “Whoever, having devised or intending to devise any scheme or artifice to defraud or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice”.

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345; over an action for forfeiture pursuant to 28 U.S.C. § 1355; and over this particular action pursuant to 18 U.S.C. §§ 981(a)(1)(C) 1343 and 16 U.S.C. § 1538 (a)(1)(E) and (g).

3. Venue is proper in this district and the Court has *In Rem* jurisdiction over the defendant currency pursuant to 28 U.S.C. §§ 1355(b)(1)(A) and 1395(b) because the acts and omissions giving rise to the forfeiture occurred in this district.

The Defendant *In Rem*

4. The Defendant *In Rem* is \$11,250.00 in United States Currency. The Defendant *In Rem* is within the possession, custody, or control of the United States.

Facts

5. The Defendant *In Rem* was seized on December 21, 2023, from Justin Igualada. This Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration of Special Agent Israel Aledo of the United States Fish and Wildlife Service (FWS).

Claim for Relief

6. The United States of America respectfully requests that the Court issue a warrant of arrest for the Defendant *In Rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendant *In Rem* condemned and forfeited to the United States of America for disposition according to law; and that the Court grant the United States of America such other and further relief as the Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22 day of July 2024.

W. Stephen Muldrow
United States Attorney

/s/Myriam Y. Fernández-González
Myriam Y. Fernández-González
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VERIFIED DECLARATION

I, Myriam Y. Fernandez-Gonzalez, Assistant United States Attorney, declare pursuant penalty of perjury as provided by 28 U.S.C. § 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the United States Fish and Wildlife Service (FWS); that everything contained therein is true and correct to the best of my knowledge and belief.

Executed in San Juan, Puerto Rico, this 22 day of July 2024.

/s/Myriam Y. Fernández-González
Myriam Y. Fernández-González
Assistant United States Attorney

VERIFICATION

I, Israel Aledo, depose and say that I am a Special Agent with the United States Fish and Wildlife Service and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *In Rem* and, pursuant to 28 U.S.C. § 1746, verify pursuant to penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in San Juan, Puerto Rico, this 18 day of July 2024.



Israel Aledo, Special Agent
U. S. Fish and Wildlife Service (FWS)

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